



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
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OCT 12 2012

REPLY TO THE ATTENTION OF:

Bart Sponseller, Director
Bureau of Air Management
Wisconsin Department of Natural Resources
101 South Webster Street
P.O. Box 7921
Madison, Wisconsin 53707-7921

Dear Mr. Sponseller:

I am transmitting to you the final Wisconsin Title V Operating Permit Program evaluation report. This evaluation is part of the U. S. Environmental Protection Agency's ongoing oversight of state and local Title V programs nationwide. EPA initiated the Wisconsin program evaluation in July 2010.

We appreciate the efforts the Wisconsin Department of Natural Resources (WDNR) has taken to improve its Title V program since our last program evaluation in 2005. Overall, EPA finds that the WDNR is successfully and actively managing its Title V program. At the time of the evaluation, EPA noted a small number of issues with WDNR's implementation of its Title V program. Please see the enclosed report for further information.

We appreciate WDNR's assistance during the program evaluation and we look forward to working with you to resolve the issues addressed in this report. If you have any questions, please contact Genevieve Damico, of my staff, at (312) 353-4761.

Sincerely,

A handwritten signature in black ink, appearing to read "George T. Czerniak".

George T. Czerniak
Acting Director
Air and Radiation Division

Enclosure

Title V Operating Permit Program Evaluation Report 2010 Review of Wisconsin's Title V Permit Program

I. Executive Summary

In 2003, as part of its oversight role, the U.S. Environmental Protection Agency (EPA) began a four year initiative to review the implementation of the Title V and New Source Review permit programs throughout the country. Wisconsin's program was last evaluated by Region 5 in September 2005. Program strengths and areas in need of improvement were identified in EPA's June 2006 report on the 2005 program review. In 2008, Region 5 embarked on a second round of permit program reviews. EPA developed and provided the Wisconsin Department of Natural Resources (WDNR) with a Title V program evaluation questionnaire which consisted of three components: follow-up to our 2005 Title V program evaluation, permit program oversight, and a brief evaluation of WDNR's implementation of Compliance Assurance Monitoring (CAM) requirements. EPA drafted questions specific to Wisconsin to discern whether previously-identified issues from 2005 have been pervasive or whether WDNR had adequately addressed the issues so that they are not recurring.

On July 12 and 13, 2010, EPA permit staff visited the WDNR offices in Madison, Wisconsin, to conduct an evaluation of the WDNR's Title V operating permit program. Prior to this visit, EPA shared a copy of the questionnaire with WDNR, and WDNR provided its responses. During the visit, WDNR's responses to the questionnaire were discussed. This final report summarizes EPA's findings and conclusions based on the answers WDNR gave to the questionnaire, discussions at the July meeting, changes that have occurred since the July meeting, EPA's review of CAM plans in permits, and EPA staff knowledge of the program from experience with reviewing WDNR permits. This report outlines the efforts WDNR has taken to improve its program and address the concerns EPA identified in its 2006 program review report, summarizes EPA's general findings from the 2010 questionnaire and evaluation, as well as any findings since the 2010 evaluation, and our recommendations to address concerns found during our review.

Based on the evaluation, EPA determined that WDNR has made a significant number of improvements to its permit program since the 2005 program evaluation. WDNR's data management and electronic permit tracking abilities have noticeably improved as a result of the State's efforts. Some of these improvements include the development of a new and searchable on-line permit tracking system. WDNR also has a new Title V permit program team leader who has begun re-prioritizing some of its Title V permit work in an effort to reduce Title V renewal permit backlogs. WDNR has also set permit issuance goals and has kept EPA updated on its progress.

In addition, WDNR has hosted open public meetings to discuss Title V petition issues in Wisconsin Title V permits and has created a Title V petition stakeholder group. The goals of this effort are to make permit conditions more consistent throughout the state and to address issues that have arisen in petitions on a program-wide basis. Some of these efforts have only recently

begun and have yet to be fully utilized. EPA supports this effort and encourages WDNR to continue the progress it has made thus far. While EPA recognizes WDNR's efforts with the petition stakeholder group, we continue to be concerned with WDNR's permit issuance rates in response to petition Orders. EPA recommends WDNR prioritize this area of work as several petition Orders that are several years old remain unaddressed at this time, and EPA is willing to provide any assistance needed.

WDNR also needs to submit its Title V program updates to EPA, as no changes or updates have been submitted to EPA for approval since 2001. WDNR has been working on this effort, and EPA encourages WDNR to submit its program changes and updates soon.

II. Summary of Evaluation and Findings

A. Follow-up on Findings from the 2005 Program Evaluation

In June 2006, EPA issued a report on our findings from the September 2005 program evaluation. EPA found two main areas in need of improvement at that time: (1) reducing the backlog of Title V renewal and modification permits to be issued, (2) and improving the public electronic permit tracking system and permit data made available to EPA.

(1) As of December 31, 2005, WDNR had issued its entire initial first round of Title V permits. Nevertheless, WDNR still had a backlog of Federally Enforceable State Operating Permits (FESOP), Title V renewal, and Title V modification permits. On January 17, 2006, WDNR completed issuance of its initial FESOP permits. However, as of April 2006, WDNR still had a backlog of approximately 100 Title V renewal permits and approximately 60 Title V permit modifications. At that time, WDNR indicated that its next permitting priority would be to complete issuance of its Title V renewal permits, and that it would be developing an issuance strategy to do so. In its 2006 report, EPA noted that WDNR should prioritize reducing this backlog and keeping permit renewals and modifications current. During our July 2010 program review, WDNR shared with EPA a draft plan to re-prioritize its Title V renewal permits in an effort to reduce backlogs and create a more steady state issuance rate in future years. Also, in its 2009-2011 Environmental Performance Partnership Agreement with EPA, WDNR committed to develop a renewal issuance strategy to eliminate the backlog of Title V permit renewals by 2012.

In January 2011, WDNR identified a list of 117 backlogged Title V renewal permits.¹ WDNR committed to issuing 30 of these backlogged permits in 2011 and 55 of these permits in 2012, for

1. WDNR is also tracking issuance data for all Title V renewal permits, including those that have become backlogged since this January 2011 snapshot. As of September 1, 2012, there were 96 additional backlogged permits.

2. We understand that WDNR has been faced with a number of challenges and obstacles to issuing permits, such as receiving significant public comments on certain permits, as well as Title V petitions.

a total reduction of 85 permits. As of September 1, 2012, WDNR has made significant progress and has issued 61 out of the 85 permits.² EPA recommends that WDNR continue prioritizing this effort in the coming year to eliminate Title V permit backlogs. If EPA can be of any assistance in regard to this issue, we are available.

(2) In the 2006 report, EPA noted that although WDNR posts its permit files on a public webpage, the information available on this webpage could be improved. For example, the existing system was not searchable or sortable, and many permit files on-line were missing documents, such as the original Title V permit or response to comments documents. To begin addressing this issue, in April 2006, WDNR issued internal guidance to its permit writers regarding the documents that need to be included in the on-line permit file. In addition, WDNR began working to address some of these issues by overhauling the whole system to improve the information made available on-line.

Since the 2006 report, numerous improvements to WDNR's on-line permit system have been achieved, including the development of a new permit tracking system. WDNR publishes all of its permit actions on-line, allowing the public up-to-date access to WDNR permit documents and decisions. This system provides on-line access to all permit documents, emissions information, facility information, WDNR contacts, and more. The system is also searchable by numerous fields. The webpage is organized according to source name, and contains both operation and construction permits, listed by permit number. The dates of certain permit actions, such as when the permit was public noticed, when it expires, and other milestones are also tracked for each permit. The site is updated at least weekly or more frequently, and permit documents can be easily downloaded. Documents available in the permit file typically include, the Title V permit (draft, proposed, and final), the statement of basis (called a Preliminary Determination in Wisconsin), the public notice, responses to comments, previously issued permits, and more.

In addition, WDNR has changed its procedure from notifying EPA of permits available for review by sending a hard copy in the mail to notifying EPA via email. This reduces EPA's burden of sorting through hard copies of mail and also reduces paper usage. WDNR also noted during the July 2010 program evaluation meeting that it is working on an email permit notification system for all interested persons. Although still in the developmental stage, WDNR stated that it believes this approach could be a more effective tool for reaching the public regarding permitting decisions. Since 2010, several changes regarding WDNR's public notice procedures have occurred. Wisconsin Act 167 went into effect on August 1, 2012. This act requires the WDNR to post hearing and permit notices on the department's official website, in addition to publishing in newspapers. Thus, in addition to the public notice information already found in the on-line permit file for each specific permit, WDNR has created a new central webpage to provide information on all hearings and public notices, which can be sorted by date, facility name, county, and other fields.

EPA believes that WDNR has addressed nearly all aspects of the on-line permit tracking issue noted in the 2006 report, and that the new system is a great improvement and very useful to EPA

and the public. However, WDNR should ensure that permit files available on-line are complete, as occasionally permit files are missing documents, especially older permits. It is important for these older permits to be available because more recent permits, such as Title V renewal permits, often refer to the original Title V permit or past construction permits. WDNR noted that addressing this issue will be an on-going quality assurance effort as it continues to issue and post permits on-line.

B. Permit Program Implementation Since 2005

During the July 2010 program evaluation, EPA asked WDNR to explain how it is handling several Title V program implementation challenges that had arisen since our last review in 2005. These issues include: (1) adequate justifications in the Preliminary Determination (PD) and responses to significant public comments, (2) responses to petition Orders, (3) the quality of renewal permits, and (4) the handling of Maximum Available Control Technology (MACT) vacatur in permitting.

(1) In the 2006 report, EPA noted that WDNR's PDs contained considerable detail and typically contained a thorough review of the source, including permit history, detailed emission calculations, a list of applicable regulations, and other pertinent information. However, based on more recent permit reviews, as well as permit reviews in response to petitions, EPA has noted that WDNR's PDs may not adequately discuss all of the decisions that went into the development of the Title V permit. Specifically, WDNR is not consistently including a description of the monitoring scheme for the facility, and how it was selected and determined to be sufficient to demonstrate compliance with the applicable requirement. Determining appropriate monitoring requires the use of discretion and judgment on the part of the permit writer and should include, at a minimum, the following decisions: the methods by which the permittee should monitor emissions; how frequently the measurement should be taken; and, if the measurements are indirect (parametric), how the measured values relate to actual emissions from the source. In any case, whether the permit writer decides that no monitoring is required to assure compliance with a limit, record keeping serves as monitoring to assure compliance, or periodic monitoring is established in the permit, the permitting authority must place the rationale for this decision in the PD. This issue has also been raised in petitions on Wisconsin Title V permits.

In addition, the adequacy of WDNR's responses to significant public comments has come up in petitions. Nearly all of the petitions filed on Wisconsin permits raised inadequate response to comments as an issue, and EPA has granted petitions on this issue numerous times. As stated in petition Orders, WDNR has an obligation to respond adequately to significant comments on draft Title V permits. The Clean Air Act and Part 70 regulations require that all Title V permit programs include adequate procedures for public notice regarding the issuance of Title V operating permits, "including offering an opportunity for public comment." It is a general principle of administrative law that an inherent component of any meaningful notice and opportunity for comment is a response to significant comments by the regulatory authority. EPA

has encouraged WDNR to share with us any response to comments it prepares prior to finalizing the document or proposing the permit to EPA, and we are available to assist WDNR in this area.

EPA also suggests WDNR develop measures to ensure the PD complies with the monitoring requirements of Part 70 and with EPA-issued Orders in response to petitions. These measures may include changes to permit application forms, permit template language, PD template language, permit checklists, central office oversight, or internal guidance as necessary. As discussed in section I above, WDNR has convened a petition stakeholder workgroup to address petition issues. It is EPA's understanding that WDNR also has developed a guidance document for permit writers to use to justify the monitoring (especially parametric monitoring ranges) in permits, and EPA recommends that WDNR move forward as soon as possible in implementing such guidance to ensure that both the PD and the permit are clear and meet the requirements of Part 70.

(2) WDNR has issued three permits in response to EPA-issued Orders, and has not yet responded to four Orders which required WDNR to revise the permits. As discussed above, WDNR has hosted open public meetings to discuss petition issues and has created a Title V petition stakeholder group. The purpose of these meetings is to provide information and an opportunity to comment on issues related to the Title V petition Orders issued by EPA on Wisconsin permits. Stakeholder participants have included representatives from industry, environmental groups, EPA, and the WDNR. Meetings have been held over the course of several years, and WDNR has said that it plans to hold additional meetings to wrap up discussions and finalize decisions. WDNR expects this effort to make permit conditions more consistent throughout the state as issues that have arisen in petitions may be present program-wide, and WDNR's goal is to address these issues on a programmatic, rather than permit by permit, basis. Some of these efforts have begun recently and have yet to be fully utilized. Although WDNR has begun taking steps to address petition issues on a programmatic basis, these efforts have been delayed by other program priorities. In order to maintain a balanced permit program, and to address the recurring petition issues, EPA recommends WDNR prioritize this area of work and finalize any recommendations from the stakeholder group as soon as possible. As recommendations or permit program changes are developed, it is imperative that WDNR keep EPA updated and involved in this process, such as by sharing drafts of proposed changes, so that EPA can provide assistance and help ensure that the changes adequately address the petition response Orders.

(3) Based on the 2010 questionnaire regarding Title V renewal applications, as well as EPA's review of renewal permits, EPA is concerned that renewal permits may not be consistently receiving an appropriate level of due diligence review from all WDNR permit writers. The issues EPA is concerned with in WDNR's renewal permits include those discussed above in this section, such as inadequate justifications in the PD for permitting decisions, as well as blanket references to past permits and PD's that may be 10 or 15 years old and which may not be available on-line. The Part 70 regulations do not make a distinction between application requirements for the original permit and a renewal. The Part 70 preamble provides: "Each

permit application must, at a minimum, include a completed application form (or forms) [consistent with the requirements of 70.5(c)] and a compliance plan. The permitting authority can, however allow the application to cross reference relevant materials where they are current and clear with respect to information required in the permit application. Such might be the case... where a source is seeking renewal of its Title V permit and no change in source operation or in the applicable requirements has occurred. Any cross referenced documents must be included in the Title V application that is sent to EPA and that is made available as part of the public docket on the permit action.” It is imperative that WDNR review and verify that any cross referenced materials are still current and clear, as well as publicly available. WDNR should not allow cross-referencing of any information that is out of date, inaccurate, or ambiguous as to its applicability. Also, if the permit application form used by WDNR is different from the original application form developed with WDNR’s approved Part 70 program, the new form should be approved by EPA, since its use would be considered a change in program procedures. Any changes or updated forms should be included in WDNR’s updated Title V program submittal, which was discussed above in Section I.

Additionally, EPA recommends that at permit renewal WDNR review the adequacy of monitoring required by the permit. The renewal application should include any information needed by WDNR to determine the adequacy of Title V monitoring under §70.6(a)(3) and (c)(1). In deciding whether additional monitoring is necessary at renewal, WDNR should consider EPA-issued Orders in response to petitions, situations where additional Title V monitoring was required at similar units subject to similar requirement, information about the margin of compliance, variability of emissions, maintenance practices, frequency of upsets and other information found in 6-month monitoring reports, deviation reports, the annual compliance certification, inspection reports, and any other source of information. EPA is available to assist WDNR in determining what is adequate if necessary.

(4) The United States District Court for the District of Columbia has vacated a number of MACT standards, including the polyvinyl chloride MACT, the brick and clay ceramics MACT, the boiler MACT, and the plywood MACT (partial). In addition, EPA’s mercury rule was vacated. Under §112(j) of the Clean Air Act, the permitting authorities bear the responsibility to implement a case-by-case MACT in the event that a federal MACT doesn’t exist. During this recent program evaluation, EPA inquired about how Wisconsin is addressing these MACT issues. In its questionnaire responses WDNR stated that it has not removed vacated MACT requirements from Title V permits. WDNR also noted during the program evaluation that in general, it may not be consistently incorporating all applicable requirements of the MACT, making clear which compliance options the permittee has chosen to use in accordance with EPA policy in White Paper II. EPA understands that WDNR’s handling of the MACTs is affected by the ongoing litigation, court decisions, a dearth of national guidance, and EPA’s pending re-promulgation and reconsideration of the boiler MACT regulations, but nonetheless encourages WDNR to include a current description and discussion of MACT applicability in its subject Title V permits. EPA recommends that at renewal WDNR also carefully review each permit to

ensure that any MACT requirements are properly incorporated and that the compliance option is clearly identified and written in accordance with EPA guidance and policy.

C. CAM Plan Review

EPA did not perform an on-site permit file review of individual Title V permits in this latest program evaluation as we did in 2005. However, EPA performed a permit review of the basic CAM permit content requirements in several permits with CAM plans. EPA developed CAM requirements, codified at 40 C.F.R. Part 64, to provide reasonable assurance that facilities comply with emissions limitations by monitoring the operation and maintenance of their control devices. Part 64 requires sources subject to the rule to submit a CAM plan with their initial Title V operating permit applications if the applications were submitted after April 1998, with any significant modification requests, or with their renewal applications. Given that most of the initial Title V applications were submitted prior to April 1998, WDNR started issuing permits incorporating CAM requirements at permit renewal, especially since the last program evaluation in 2005. An assessment of CAM permit content was included in the 2010 questionnaire.

As part of our evaluation, EPA asked WDNR to identify and provide three permits with CAM provisions and the supporting documentation for EPA review. WDNR provided a list with numerous permits containing CAM plans (some plans were listed as permit attachments and others were listed as having plans written into the permit). EPA reviewed the following permits with CAM plans: (1) Phoenix Coaters, permit 470079500-P10, (2) Curwood Inc. Appleton, permit 445008080-P02, and (3) Curwood Inc. New London, permit 445030850-P10, and answered the CAM related questions in the questionnaire. A summary of our findings is included below. (Note the reason that two Curwood facilities were reviewed was because one was listed as having the CAM plan attached, and the other was listed as having the CAM plan written into the permit, and we wanted to compare the formats.)

(1) Phoenix Coaters, permit 470079500-P10.

The PD for the permit provides the date the CAM plan was submitted and the units/processes that are subject to CAM. No further discussion of the CAM plan is provided. The body of the permit does not mention or refer to the CAM plan, nor include CAM as a requirement. The permit requires that overspray filters be used at all times, that the permittee perform a visual inspection each day in order to detect and correct filter overloading, filter tearing, or other filter malfunctions, and keep a log of all inspections and maintenance and dates of filter replacements. The CAM plan is contained in an appendix, Part III, to the permit. It is very brief and provides only a little more detail than what the permit requires for the overspray filters. For example, it describes correct filter overloading, how often filters will be changed, and how often filter fans will be cleaned. There is not any rationale or justification section provided.

(2) Curwood Inc., Appleton, permit 445008080-P02 (listed as having a CAM plan written into the permit.) The PD for the permit provides the date the CAM plan was submitted

and the units/processes that are subject to CAM. The PD also notes how WDNR reviewed the CAM plan and found it to follow recommended EPA CAM protocols. The body of the permit states for the subject unit that it is a pollutant-specific emissions unit subject to the CAM requirements of 40 C.F.R. Part 64, and that the permittee shall comply with the CAM requirements for each indicator of performance as outlined in Part III of this operation permit. (Aside from that, it does not appear that the CAM plan is actually written into the permit as noted in the response to the questionnaire, or that there is any difference in the plan that is written into the permit versus one that is attached to the permit, as both were made to be Part III of the permit.) The CAM plan itself is written in a chart format, which makes it easy to follow and to identify the specific CAM requirements. The elements of the chart include the subject unit, indicator, indicator range, corrective action, performance criteria, data representativeness, verification of operational status, QA/QC practices and criteria, monitoring frequency, data collection procedure, data averaging period and recordkeeping. While the chart format helps to identify all of the CAM elements, some elements are listed as being not applicable; in some of these cases it is quite obvious why something is not applicable, but in other cases it is not, and no further explanation or rationale is provided. Also, there is not any rationale section included.

(3) Curwood Inc., New London, permit 445030850-P10 (listed as being attached to the permit.) The PD for the permit mentions that the facility is subject to CAM and that a plan is attached to the permit. There is no further CAM discussion. The body of the permit states that the CAM plan is in Section III of the permit and states that the permittee shall comply with applicable provisions of the CAM plan within 180 days of permit issuance. The date the WDNR reviewed the plan is also included. The CAM plan itself is written in a chart format, and follows the same format as for the Curwood permit above, which makes it easy to follow and to identify the specific CAM requirements. However, there doesn't seem to be any difference between the plan that is listed as being written into the permit versus the plan attached to the permit. Many of the elements of the CAM plan are similar or identical to those for the Curwood plan above, and for items listed as not applicable, no further explanations or rationale is provided. Also, there is not any rationale section provided.

Overall, there does not seem to be any consistent CAM plan format from permit to permit. However, in response to the questionnaire, WDNR noted that it has issued guidance to assist permit writers with CAM implementation and has provided training on statewide permit conference calls. In general, WDNR briefly discusses in the permit's PD CAM applicability or non-applicability to the facility. The chart/table format used for the two Curwood CAM plans, was easy to follow, and provides a good format to ensure that all of the necessary elements of a CAM plan are included. In the cases where WDNR includes the CAM plan as an attachment or appendix to the permit, the permit would more clearly meet the intent of Part 64 if the body of the permit specifically addressed the requirements of 40 C.F.R. § 64.6(c). This would also meet the requirements of Part 70, as EPA discusses in several petition response Orders that

requirements should not be contained in off-permit plans, unless such plans are attached to the permit and are available during the public notice and comment periods.

EPA has some concerns with WDNR's implementation of CAM pursuant to 40 C.F.R. Part 64. In the permits reviewed, WDNR does not always provide a rationale to explain why the permittee's selection of the indicator and indicator range will provide reasonable assurance of compliance with emission limitations and standards. In general, the PDs for the permits reviewed contained little information about the decision making used in developing the CAM plans. Also, for all three plans reviewed, certain elements of CAM were missing or did not meet the minimum requirements. For example, in some cases the minimum monitoring frequency is not being met, but there is no explanation of why the monitoring in the permit is still sufficient to assure compliance. EPA urges WDNR to include its review and conclusions of its approval of the CAM plans in the PD. While WDNR noted that it has issued guidance to assist permit writers with CAM implementation and has provided training, EPA urges WDNR to provide additional guidance or training, as well as peer or management review of permits, as necessary, to ensure that CAM plan requirements are being met, and that justifications for the adequacy of the plan are being included in the PD.

Note that since the 2010 evaluation EPA has had the opportunity to look at other CAM plans in additional permits. In general, CAM plans for larger sources, such as for several coal fired power plants, did contain more detail on the selection of the indicator and indicator range and how the indicator and range will provide reasonable assurance of compliance with emission limitations and standards.

D. State Feedback

In the questionnaire, WDNR was asked to provide feedback to EPA on the national program regarding any other concerns. WDNR stated that it would be helpful to have some national or regional training or guidance provided on how to implement the new National Ambient Air Quality Standards at existing sources; how to handle compliance schedules for modeling issues with the new Nitrogen Oxides and Particulate Matter (less than 2.5 microns) standards, and what averaging times to use for these standards as well as for the new Green House Gas standards; and how to write "Mandatory Reporting Requirements" into Title V permits when there aren't any Title I construction permit conditions. WDNR also said that trainings related to writing better permits were always helpful.

WDNR also said that its near term Title V permit program priorities were to complete addressing the Title V backlog issue, then to endeavor to maintain a minimal backlog in the future, and to update its Title V program approval. WDNR said its priority in the longer term was to continue to improve effectiveness and efficiency. WDNR also stated that EPA could help foster successful state Title V programs by continuing to have open and frequent communication. In addition, WDNR and EPA discussed having monthly Title V calls, and scheduled the first call for September 2010. A handful of such calls took place to discuss updating WDNR's Title V

program approval, but regular calls have not continued. In addition, calls have been occurring between WDNR and EPA to discuss the pending Title V permits in response to the EPA-issued petition Orders. EPA believes that regular calls are useful and could also be used to discuss other Title V permit or program issues that should arise.

III. Conclusion and Recommendations

As discussed above, WDNR has made many improvements to its Title V permit program since the 2005 program evaluation, and has made great progress in the areas of data management and information available to the public, as well as great strides in reducing its Title V permit backlog and meeting its 2011 permit issuance goals. However, WDNR still has some permit backlog issues it needs to address such as its work on issuing permits in response to EPA-issued petition Orders, and finalizing any program-wide changes needed to address these Orders. EPA also recommends that WDNR use the Title V permit renewal process to quality assure its PD and permit, to ensure all decision making is documented, including CAM, to ensure that the PD and permit are clear, and finally, to ensure that all past and present documents available electronically are posted on-line. EPA is available for assistance with these efforts, for example, in reviewing any response to comments document prepared by WDNR. EPA also recommends that WDNR continue its efforts to monitor its resources and initiatives to ensure that it maintains a balanced permitting program, and to update its Title V program approval. EPA is available to assist WDNR in any way necessary to move forward with these recommendations.